



**CERTIFICATE OF SERVICE**

The undersigned certifies that on July 30 2019, Defendants served a true and correct copy of the foregoing on all known counsel of record via the Northern District of Texas CM/ECF filing system.

/s/ C. Dunham Biles

C. Dunham Biles

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

DEIDRA M. ROPER a/k/a “Spinderella”,	§	
and SPINDERELLA	§	
ENTERTAINMENT, LLC,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 3:19-cv-01651-S
	§	
CHERYL JAMES-WRAY a/k/a	§	
CHERYL JAMES, SANDRA DENTON,	§	
JAMES MAYNES, AND S & C	§	
PRODUCTIONS, INC.,	§	
	§	
Defendants.	§	

**DECLARATION OF JAMES MAYNES IN SUPPORT OF  
DEFENDANTS’ RESPONSE IN OPPOSITION TO  
PLAINTIFFS’ REQUEST FOR A TEMPORARY RESTRAINING ORDER**

I, James Maynes, do hereby state and declare as follows:

1. I am a specially-appearing defendant in the above-captioned matter, along with Cheryl James-Wray a/k/a Cheryl James (“Salt”), Sandra Denton (“Pepa”), and S & C Productions (“S & C”) (together, “Salt-N-Pepa” or “Defendants”). I am the longtime manager of the musical group “Salt N Pepa,” which is comprised of Salt and Pepa. I am also responsible for overseeing business operations for S & C. As a result, I have personal knowledge of the facts contained in this declaration and, if called and sworn as a witness, I could and would competently testify thereto. I make this declaration in support of Defendants’ Response In Opposition to Plaintiffs’ Request For A Temporary Restraining Order.

2. Since at least February 22, 2019, Defendants and Plaintiffs Deidra M Roper a/k/a “Spinderella” and Spinderella Entertainment, LLC (together, “Spinderella” or “Plaintiffs”) have been engaged in negotiations to find an amicable resolution to Spinderella being asked to no longer perform with Salt and Pepa. This included Spinderella’s newly recognized performer royalty rights under 17 USC § 114 (*i.e.*, SoundExchange, Inc. rights). Furthermore, Salt-N-Pepa wished to provide Spinderella with a share of the group “Salt N Pepa’s” royalties from merchandising sales for merchandise bearing Spinderella’s name and likeness, for shows in which Spinderella participated. Instead of continuing negotiations in good faith, Spinderella engaged a new attorney, and filed this lawsuit. Nonetheless, Salt-N-Pepa, after an accounting, paid Spinderella one-third of royalties for Salt N Pepa merchandise sold in 2018 containing Spinderella’s name, likeness and/or mark (\$1,758.05). A true and correct copy of a spreadsheet containing all “Salt N Pepa” merchandise sales that contained Spinderella’s name, likeness, and mark from 2015 to the first quarter of 2019 is attached hereto and incorporated herein as **Exhibit A**. A true and correct copy of a spreadsheet containing all “Salt N Pepa” merchandise sales that

contained Spinderella's name, likeness, and/or mark from 2018 is attached hereto and incorporated herein as **Exhibit B**. A true and correct printout of the receipt for the July 15, 2019 payment of Spinderella's share of merchandise sales containing her name, likeness, and/or mark is attached hereto and incorporated herein as **Exhibit C**. Moreover, the MixTape Tour has ended and the I Love the 90s Tour is nearly completed (one remaining show in October).

3. Salt-N-Pepa never used Spinderella's name, likeness, or marks without authorization. Indeed, Spinderella's name, likeness, and mark were only included because of her repeated insistence that they be included on promotional materials. After January 4, 2019, when Spinderella was asked to no longer perform with Salt and Pepa, Salt-N-Pepa immediately ceased using Spinderella's name and likeness or her mark, including on promotional materials and merchandise. Moreover, the DJ chosen to replace Spinderella was not picked to be a look-a-like of Spinderella—aside from the fact that Spinderella's replacement was a middle-aged African-American woman.

4. By January 7, 2019, Salt-N-Pepa informed all relevant concert promoters, including Live Nation (who was responsible for The MixTape Tour) and Universal Attractions (who was responsible for I Love The 90s Tour) that Spinderella was no longer performing with the group "Salt N Pepa" and to discontinue all use of her name and likeness in connection with promotional materials. A true and correct redacted copy (to protect privileged and sensitive business information) of an email from me, dated January 7, 2019, to Brad Mavra at Live Nation stating that Spinderella is no longer performing with the group and to cease using her in promotional material is attached hereto and incorporated herein as **Exhibit D**. A true and correct redacted copy (to protect privileged and sensitive business information) of an email from Jeff Epstein at Universal Attractions, dated January 7, 2019, to me confirming that I informed

Universal Attractions on January 4, 2019, that Spinderella was no longer performing with the group and to cease using her in promotional material is attached hereto and incorporated herein as **Exhibit E**. Both Exhibit D and Exhibit E were made near or at the time the information was transmitted in the regular course of my business activity and preserving these emails is a regular practice of my business. Unfortunately, it was those concert promoters who failed to cease using Spinderella's name and likeness after we (*i.e.*, Defendants) informed them to cease using Spinderella's name and likeness. Despite making our objections known, Salt-N-Pepa had no control over how the concert promoters created and exploited promotional materials.

5. Spinderella is not, and has never been, a partner of the group "Salt N Pepa." Spinderella was always a contracted performer for the group. She was hired and fired at the discretion of Salt and Pepa *via* their business entity S & C. Indeed, Spinderella's own correspondence with Salt from 2013 and 2014, when she was rehired to perform with the group, demonstrates: (1) the terms by which she was re-hired, which did not include profit participation or royalties; (2) that she was grateful to Salt and Pepa for providing her with the opportunity to perform with them again; and (3) that Salt and Pepa dictated how Spinderella would perform on stage. A true and correct redacted copy (to protect privilege and privacy) of e-mail correspondence between Spinderella and Salt from December 6 and 10, 2013, setting forth the terms of the parties' agreement that Salt provided me is attached hereto and incorporated herein as **Exhibit F**. A true and correct redacted copy (to protect privilege and privacy) of e-mail correspondence between Spinderella and Salt from September 7-8, 2014 amending the terms of the parties' agreement that Salt provided me is attached hereto and incorporated herein as **Exhibit G**.

6. The group “Salt N Pepa” is—by definition—comprised of Salt and Pepa. The group’s name does not include Spinderella. Moreover, the group’s business, including its trademark, is completely owned and operated by S & C, whose sole shareholders are Salt and Pepa. Spinderella is not—and never was—a shareholder of S & C. Spinderella never shared in the financial losses of the group “Salt N Pepa” or S & C. For example, in connection with the group “Salt N Pepa’s” Las Vegas residency, Salt-N-Pepa lost money. In contrast, Spinderella bore no risk and was paid for each performance. Further, Spinderella did not have a right to control or manage the group “Salt N Pepa” or S & C.

7. Spinderella’s status as an independent contractor (and, therefore, not a partner of the group “Salt N Pepa”) is further evidenced by the 1099-MISC income statements S & C issued to Spinderella Entertainment, LLC for fiscal years 2014-2018. True and correct redacted copies (to protect sensitive financial and business information) of the 1099-MISC income statements S & C issued to Spinderella Entertainment, LLC for fiscal years 2014-2018 are attached hereto and incorporated herein as **Exhibit H**.

8. Salt-N-Pepa in no way sought to interfere with Spinderella’s career opportunities—particularly securing a Las Vegas residency. To the contrary, I advocated on behalf of Spinderella to get a Las Vegas Residency. Rather, I understand that Spinderella did not get a Las Vegas residency because the promoter lacked interest based, at least in part, over a concern about ticket sales (would Spinderella draw a sufficient crowd). I sought to assuage those concerns, but was unsuccessful.

9. Spinderella was provided two payments of \$31,500 for a total of \$63,000 on December 24, 2018 and January 8, 2019, respectively, for the Las Vegas residency. True and correct printouts of receipts of the December 24, 2018 and January 8, 2019 payments are

attached hereto and incorporated herein as **Exhibit I**. This resulted in paying all monies owed to Spinderella for her work on the Las Vegas residency.

I swear under penalty of perjury under the laws of the United States that the contents of this declaration are true and correct. Executed this 30th day of July, 2019 in New York City, New York.

  
James Maynes



# **EXHIBIT A**

SNP-000007



Sales Channel	Item	Design	Quantity	Gross	Rate	Due to SNP
B2B	T-Shirts (FP)	NYC 1987	18	\$ 136.50	0.2	\$ 27.30
B2B	T-Shirts (FP)	Photograph	11	\$ 88.00	0.2	\$ 17.60
B2B	T-Shirts (FP)	P-Push It	452	\$ 4,509.80	0.2	\$ 901.96
B2B	T-Shirts (MP)	NYC 1987	300	\$ 2,108.50	0.15	\$ 316.28
B2B	T-Shirts (MP)	Photograph	300	\$ 2,400.00	0.15	\$ 360.00
B2B	T-Shirts (MP)	P-Push It	4258	\$ 30,421.55	0.15	\$ 4,563.23
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - S	2	\$ 60.00	0.3	\$ 18.00
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - M	2	\$ 60.00	0.3	\$ 18.00
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - L	4	\$ 114.00	0.3	\$ 34.20
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - XL	1	\$ 30.00	0.3	\$ 9.00
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - 2XL	2	\$ 61.00	0.3	\$ 18.30
D2C	T-Shirt	Photograph on White T-Shirt - M	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Photograph on Black T-Shirt - L	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Photograph on Black T-Shirt - XL	2	\$ 45.00	0.3	\$ 13.50
D2C	T-Shirt	Photograph White T-Shirt - S	9	\$ 225.00	0.3	\$ 67.50
D2C	T-Shirt	Photograph White T-Shirt - M	5	\$ 125.00	0.3	\$ 37.50
D2C	T-Shirt	Photograph White T-Shirt - L	9	\$ 225.00	0.3	\$ 67.50
D2C	T-Shirt	Photograph White T-Shirt - XL	8	\$ 196.25	0.3	\$ 58.88
D2C	T-Shirt	Push It B/W Photo Group Shot on White T-Shirt - S	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It B/W Photo Group Shot on White T-Shirt - XL	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It B/W Photo Group Shot on White T-Shirt - 2XL	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It Black T-Shirt - S	5	\$ 125.00	0.3	\$ 37.50
D2C	T-Shirt	Push It Black T-Shirt - M	14	\$ 342.50	0.3	\$ 102.75
D2C	T-Shirt	Push It Black T-Shirt - L	13	\$ 317.50	0.3	\$ 95.25
D2C	T-Shirt	Push It Black T-Shirt - XL	8	\$ 200.00	0.3	\$ 60.00
D2C	T-Shirt	Push It Black T-Shirt - 2XL	7	\$ 181.00	0.3	\$ 54.30
D2C	T-Shirt	Push It Color Photo Group Shot on Black T-Shirt - L	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It Color Photo Group Shot on Black T-Shirt - 2XL	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - S	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - M	7	\$ 171.25	0.3	\$ 51.38
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - L	6	\$ 150.00	0.3	\$ 45.00
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - XL	6	\$ 146.25	0.3	\$ 43.88
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - 2XL	7	\$ 174.10	0.3	\$ 52.23
D2C	T-Shirt	Push It Group Shot on White T-Shirt - S	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It Group Shot on White T-Shirt - M	2	\$ 46.25	0.3	\$ 13.88
D2C	T-Shirt	Push It Group Shot on White T-Shirt - L	6	\$ 150.00	0.3	\$ 45.00
D2C	T-Shirt	Push It Group Shot on White T-Shirt - XL	3	\$ 75.00	0.3	\$ 22.50
D2C	T-Shirt	Push It Group Shot on White T-Shirt - 2XL	1	\$ 26.00	0.3	\$ 7.80
D2C	T-Shirt	Salt N Pepa Photograph White T-Shirt - S	10	\$ 250.00	0.3	\$ 75.00
D2C	T-Shirt	Salt N Pepa Photograph White T-Shirt - M	8	\$ 200.00	0.3	\$ 60.00
D2C	T-Shirt	Salt N Pepa Photograph White T-Shirt - L	2	\$ 50.00	0.3	\$ 15.00
D2C	T-Shirt	Salt N Pepa Photograph White T-Shirt - XL	5	\$ 125.00	0.3	\$ 37.50
D2C	T-Shirt	Salt N Pepa Photograph White T-Shirt - 2XL	2	\$ 52.00	0.3	\$ 15.60
Tour	T-Shirt	CHARACTER NIGHT SHIRT - S	3	\$ 120.00	Various	\$ 35.06
Tour	T-Shirt	CHARACTER NIGHT SHIRT - M	0	\$ -	Various	\$ (40.68)
Tour	T-Shirt	CHARACTER NIGHT SHIRT - L	1	\$ 40.00	Various	\$ 3.55
Tour	T-Shirt	CHARACTER NIGHT SHIRT - XL	3	\$ 120.00	Various	\$ 26.93
Tour	T-Shirt	CHARACTER NIGHT SHIRT - 2XL	2	\$ 80.00	Various	\$ 20.59
Tour	T-Shirt	Graffiti T-Shirt - S	4	\$ 120.00	Various	\$ (17.55)

SNP-000008



Tour	T-Shirt	Graffiti T-Shirt - M	3	\$ 90.00	Various	\$ (42.38)
Tour	T-Shirt	Graffiti T-Shirt - L	3	\$ 90.00	Various	\$ (55.10)
Tour	T-Shirt	Graffiti T-Shirt - XL	6	\$ 200.00	Various	\$ (25.27)
Tour	T-Shirt	Graffiti T-Shirt - 2XL	3	\$ 100.00	Various	\$ (17.59)
Tour	T-Shirt	Group Shot White - S	60	\$ 1,781.25	Various	\$ 551.65
Tour	T-Shirt	Group Shot White - M	117	\$ 3,473.02	Various	\$ 1,093.78
Tour	T-Shirt	Group Shot White - L	105	\$ 3,073.00	Various	\$ 889.85
Tour	T-Shirt	Group Shot White - XL	121	\$ 3,562.95	Various	\$ 1,118.15
Tour	T-Shirt	Group Shot White - 2XL	58	\$ 1,708.53	Various	\$ 481.27

Due to Salt-N-Pepa \$11,453.06

SNP-000009

## **EXHIBIT B**

SNP-000010



MERCH DIRECT  
• EST 1999 •

Sales Channel	Item	Design	Quantity	Gross	Rate	Due to SNP
B2B	T-Shirt	NYC 1987	15	\$ 112.50	0.2	\$ 22.50
B2B	T-Shirt	Photograph	11	\$ 88.00	0.2	\$ 17.60
B2B	T-Shirt	P-Push It	252	\$ 2,510.80	0.2	\$ 502.16
D2C	T-Shirt	Push It Black T-Shirt - S	2	\$ 50.00	0.3	\$ 15.00
D2C	T-Shirt	Push It Black T-Shirt - M	6	\$ 142.50	0.3	\$ 42.75
D2C	T-Shirt	Push It Black T-Shirt - L	8	\$ 192.50	0.3	\$ 57.75
D2C	T-Shirt	Push It Black T-Shirt - XL	6	\$ 150.00	0.3	\$ 45.00
D2C	T-Shirt	Push It Black T-Shirt - 2XL	5	\$ 129.00	0.3	\$ 38.70
D2C	T-Shirt	Photograph White T-Shirt - S	12	\$ 300.00	0.3	\$ 90.00
D2C	T-Shirt	Photograph White T-Shirt - M	9	\$ 225.00	0.3	\$ 67.50
D2C	T-Shirt	Photograph White T-Shirt - L	10	\$ 250.00	0.3	\$ 75.00
D2C	T-Shirt	Photograph White T-Shirt - XL	9	\$ 221.25	0.3	\$ 66.38
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - S	1	\$ 25.00	0.3	\$ 7.50
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - M	7	\$ 171.25	0.3	\$ 51.38
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - L	7	\$ 175.00	0.3	\$ 52.50
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - XL	6	\$ 146.25	0.3	\$ 43.88
D2C	T-Shirt	Push It Group Shot on Black T-Shirt - 2XL	7	\$ 174.10	0.3	\$ 52.23
D2C	T-Shirt	Push It Group Shot on White T-Shirt - S	2	\$ 50.00	0.3	\$ 15.00
D2C	T-Shirt	Push It Group Shot on White T-Shirt - M	2	\$ 46.25	0.3	\$ 13.88
D2C	T-Shirt	Push It Group Shot on White T-Shirt - L	6	\$ 150.00	0.3	\$ 45.00
D2C	T-Shirt	Push It Group Shot on White T-Shirt - XL	3	\$ 75.00	0.3	\$ 22.50
D2C	T-Shirt	Push It Group Shot on White T-Shirt - 2XL	2	\$ 51.00	0.3	\$ 15.30
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - S	1	\$ 30.00	0.3	\$ 9.00
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - M	2	\$ 60.00	0.3	\$ 18.00
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - L	2	\$ 54.00	0.3	\$ 16.20
D2C	Long Sleeve	Push It Cartoon Group Shot Long Sleeve - 2XL	1	\$ 31.00	0.3	\$ 9.30
D2C	T-Shirt (Specialty)	Salt N Pepa Graffiti Tee - M	2	\$ 72.00	0.25	\$ 18.00
D2C	T-Shirt (Specialty)	Salt N Pepa Graffiti Tee - L	4	\$ 160.00	0.25	\$ 40.00
D2C	T-Shirt (Specialty)	Salt N Pepa Graffiti Tee - XL	3	\$ 120.00	0.25	\$ 30.00
D2C	T-Shirt (Specialty)	Salt N Pepa Graffiti Tee - 2XL	5	\$ 200.00	0.25	\$ 50.00
Tour	T-Shirt	CHARACTER NIGHT SHIRT - S	3	\$ 120.00	Variable	\$ 35.06
Tour	T-Shirt	CHARACTER NIGHT SHIRT - M	0	\$ -	Variable	\$ -
Tour	T-Shirt	CHARACTER NIGHT SHIRT - L	1	\$ 40.00	Variable	\$ 11.69
Tour	T-Shirt	CHARACTER NIGHT SHIRT - XL	3	\$ 120.00	Variable	\$ 35.06
Tour	T-Shirt	CHARACTER NIGHT SHIRT - 2XL	2	\$ 80.00	Variable	\$ 20.59
Tour	T-Shirt	Graffiti T-Shirt - S	4	\$ 120.00	Variable	\$ (6.78)
Tour	T-Shirt	Graffiti T-Shirt - M	3	\$ 90.00	Variable	\$ (4.22)
Tour	T-Shirt	Graffiti T-Shirt - L	3	\$ 90.00	Variable	\$ (4.22)
Tour	T-Shirt	Graffiti T-Shirt - XL	6	\$ 200.00	Variable	\$ (2.43)
Tour	T-Shirt	Graffiti T-Shirt - 2XL	3	\$ 100.00	Variable	\$ (4.93)
Tour	T-Shirt	Group Shot White - S	49	\$ 1,421.28	Variable	\$ 446.42
Tour	T-Shirt	Group Shot White - M	98	\$ 2,843.01	Variable	\$ 922.39
Tour	T-Shirt	Group Shot White - L	93	\$ 2,692.98	Variable	\$ 861.21
Tour	T-Shirt	Group Shot White - XL	112	\$ 3,262.98	Variable	\$ 1,016.15
Tour	T-Shirt	Group Shot White - 2XL	48	\$ 1,378.56	Variable	\$ 398.16

Total Due to Salt-N-Pepa \$5,274.14

SNP-000011

## **EXHIBIT C**

SNP-000012

**CHASE** *for* BUSINESS

Printed from Chase for Business

[Schedule payment >](#)

Filtered by

Pay to Spinderella Entertainment LLC

[Clear filter >](#)

Pay to	Pay from	Status	Send on	Deliver by	Amount	
Spinderella Entertainment LLC (...5822) VENDOR	S & C PRODUCTIONS IN (...5558)	Paid	Jul 15, 2019	Jul 16, 2019	\$1,758.05	<a href="#">Request info &gt;</a>

Pay to Spinderella Entertainment LLC (...5822)

Pay from S &amp; C PRODUCTIONS IN (...5558)

Amount \$1,758.05

Send on Jul 15, 2019

Deliver by Jul 16, 2019

Payment arrives in 1 business day

Addenda 2018 Merch Sales

Status Paid

Submitted by DENNY MENDEZ, Jul 14, 2019 10:11:31 PM

Last updated by Not Available, Jul 16, 2019 8:17:36 AM

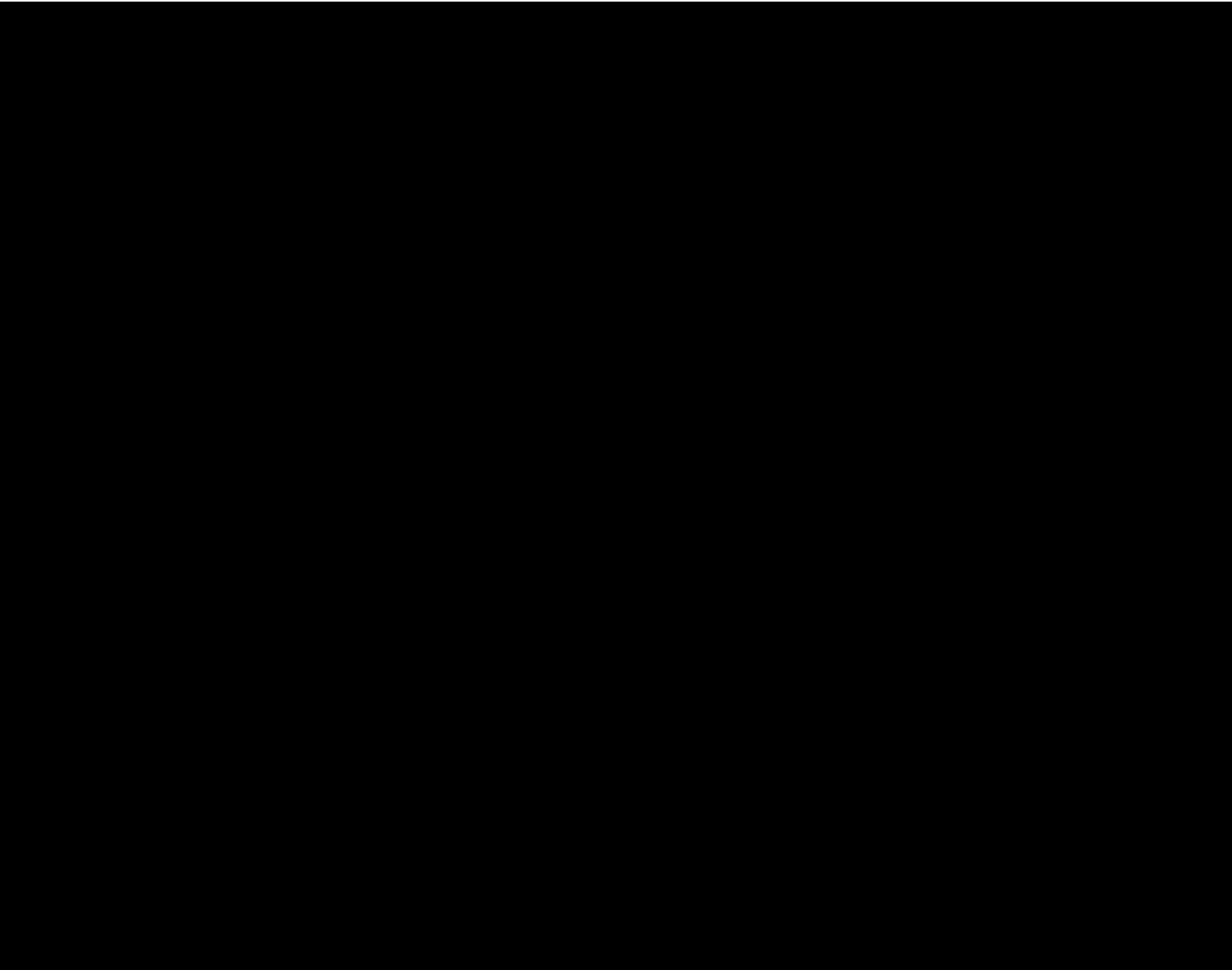
Chase transaction number 5223809405

Spinderella Entertainment LLC (...5822) VENDOR	S & C PRODUCTIONS IN (...5558)	Paid	Jan 7, 2019	Jan 8, 2019	\$31,500.00	<a href="#">Request info &gt;</a>
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## **EXHIBIT D**

SNP-000014





**From:** james maynes [REDACTED]  
**Subject:** Checking in  
**Date:** January 7, 2019 at 4:06:23 PM EST  
**To:** Brad Wavra [REDACTED]@livenation.com>  
**Cc:** Jared Paul [REDACTED]@facultyinc.com>

Brad,

Trust you had an amazing holidays!!! Welcome back. This email is to formerly advise you that Spinderella is no longer employed by Salt-N-Pepa. Please be sure that she is no longer included in any of the promotions. I made Jared aware prior to the holidays that this would probably happen as I did you, effective immediately this information is factual.

james maynes  
[REDACTED]  
[REDACTED]



# **EXHIBIT E**

SNP-000017



**From:** james maynes [REDACTED]  
**Subject:** Re: snp - spinderella is no longer in the group  
**Date:** January 7, 2019 at 12:34:40 PM EST  
**To:** Jeff Allen <[REDACTED]@universalattractions.com>

thx!!

james maynes  
[REDACTED]  
[REDACTED]



On Jan 7, 2019, at 12:32 PM, Jeff Epstein <[REDACTED]@universalattractions.com> wrote:

**Jeff Epstein**  
**UAA | Universal Attractions Agency**  
[REDACTED]@universalattractions.com  
[www.UAAgency.com](http://www.UAAgency.com)  
15 West 36th Street | 8th Floor | New York, NY 10018  
Phone: [REDACTED] | Fax: [REDACTED]

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**From:** Roger LeBlanc <[REDACTED]@kaaboolc.com>  
**Sent:** Monday, January 07, 2019 12:15 PM  
**To:** Jeff Epstein <[REDACTED]@universalattractions.com>  
**Cc:** Jeff Allen <[REDACTED]@universalattractions.com>  
**Subject:** Re: snp - spinderella is no longer in the group

Oh crap. Alright, thanks for the heads up. Do you have new promo? As for Cryo, and confetti, I have not gotten the cost yet. I will ask again.

Thanks,  
Roger

On Jan 5, 2019, at 11:22 AM, Jeff Epstein  
<[REDACTED]@universalattractions.com> wrote:

hey roger, i was just advised last night that spinderella is no longer performing with snp and we need to have any advertisements with her name changed

Also please let me know where we are regarding confetti and  
cryo. Thanks.

**Jeff Epstein**

**UAA | Universal Attractions Agency**

██████████@universalattractions.com

[www.UAAgency.com](http://www.UAAgency.com)

15 West 36th Street | 8th Floor | New York, NY 10018

Phone: ██████████ | Fax: ██████████

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## **EXHIBIT F**

SNP-000021

-----Original Message-----

From: Deidra Roper <[REDACTED]>

To: [REDACTED] <[REDACTED]>

Sent: Tue, Dec 10, 2013 01:49 PM

Subject: Re: New Jack City remix tour

Hey Cheryl.. This is great and im excited too. Lets do a contract reflecting this and new added Boston date.. if possible can u request an additional dressing room with seating and beverages for me as well as a small advance as we get closer ?

Spin

Sent from my iPhone

On Dec 6, 2013, at 2:46 PM, [REDACTED] wrote:

Hey Spin: here are the dates as well as the deal points we discussed today. I'm excited!!

**2k per show 6 shows**  
**\$50 per day per diem**  
**\$100 per day rehearsal 3 days**  
**1 coach ticket**  
**1 regular hotel room**

**The show will run the way Salt n Pepa determine. If there is a DJ set depending on the time, Spin agrees to drop the records of Salt n Pepa choosing. No scratching during the songs.**



Feb 3rd

Feb 4th

Feb 5th

**Tour Dates**

Feb 7th Orlando Bob Carr Arena Spin

Feb 8th Charlotte Owens Auditorium Spin

Feb 14th Columbus Veteran Arena Spin

Feb 15th Newark Symphony Hall Spin

Feb 16th Buffalo Shea's Theater Spin

March 14th Cincinatti Music Hall Spin not Available Dee Wiz

March 15th Hartford Bushnell Auditorium Spin not available Dee Wiz

March 29th Richmond Landmark Theater Spin

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**Cheryl "Salt" James**

Salt Songs Inc.

**Email:** [REDACTED]

**Web:** SaltNPepa.net

**Twitter/Instagram:** @DaOnlySalt

*Persistence, dedication, passion, hard work, and prayer shifts the atmosphere.*

## **EXHIBIT G**

SNP-000024

-----Original Message-----

From: Cheryl James <[REDACTED]>  
To: Deidra Roper <[REDACTED]>  
Cc: Sandra Denton <[REDACTED]>  
Sent: Mon, Sep 8, 2014 2:50 pm  
Subject: Re: Ref. Spin

Great!

Sent from my iPhone

On Sep 8, 2014, at 2:39 PM, Deidra Roper <[REDACTED]> wrote:

Although we never discussed oz, in particular, due to my latest health issue, my concern for comfort when traveling for extended periods of time is all the more important .

Please know, I am extremely grateful to be back and I do appreciate and thank u for everything u have done for me and will continue to give my all at every performance .

Yes y'all, im clear that SnP would not be responsible for 1st class or upgrades. This I agree too and have no issue w travel here in states. However, Im thinking of international travel which require longer and more uncomfortable flights as well as a rigorous schedule for each of us .. Perhaps, we can let those booking agents and promoters know that Spinderella is on the show .. Spinderellas 'premium economy' ticket can be added to SnP's fee/rider to accomodate me.. This wouldn't and shouldn't come from your pockets.

I reached out for ur assistance when after speaking w Gavin and him telling me upgrades aren't available based on the flight I'm on..

I appreciate and am thankful for the raise.. this helps and I will utilize it to pay for the premium economy upgrade .

Sent from my iPhone

On Sep 7, 2014, at 9:27 PM, Sandra Denton <[REDACTED]> wrote:

Hey girl hope all is good please have a look at the email below

----- Forwarded message -----

From: **Sandra Denton** <[REDACTED]>

Date: Sunday, September 7, 2014

Subject: Ref. Spin

To: Cheryl james <[REDACTED]>

---spin we have given money to support you in the time of need not that you ask but just showing our love  
---Salt n Pepa have made a decision to give you a raise starting on the Australia tour 2014 from a fee of \$2,000 to \$2,500 which is a number that you spoke about before. So we have decided to meet that.

\_\_\_\_\_and also to be clear there was a misunderstanding, I Pepa and Gavin never had a conversation regarding your flight for Australia.

--- because what has always been on the table for all parties involved with shows regarding flights everyone is issued a coach ticket, and anyone who wants to upgrade, falls on the individual person to take care of there own upgrades.

Salt n Pepa are NOT responsible for any upgrades.

--

--

**Cheryl "Salt" James**

Salt Songs Inc.

**Email:** [REDACTED]

**Web:** SaltNPepa.net

**Twitter/Instagram:** @DaOnlySalt

*Persistence, dedication, passion, hard work, and prayer shifts the atmosphere.*

## **EXHIBIT H**

SNP-000027

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.  S & C Productions, Inc. [REDACTED]  Melville NY 11747		1 Rents \$	OMB No. 1545-0115  <b>2017</b> Form 1099-MISC	<b>Miscellaneous Income</b>
		2 Royalties \$		
		3 Other income \$		
PAYER'S federal identification number [REDACTED]	RECIPIENTS identification number [REDACTED]	4 Federal income tax withheld \$	<b>Copy B For Recipient</b>	
5 Fishing boat proceeds \$	6 Medical and health care payments \$			
RECIPIENT'S name  Spinderella Entertainment LLC Street address (including apt. no.) [REDACTED] City or town, state or province, country, and ZIP or foreign postal code Dallas TX 75243		7 Nonemployee compensation \$ [REDACTED]	8 Substitute payments in lieu of dividends or interest \$	This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds \$	
		11	12	
Account number (see instructions) [REDACTED]	FATCA filing requirement <input type="checkbox"/>	13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$	
15a Section 409A deferrals \$	15b Section 409A income \$	16 State tax withheld \$	17 State/Payer's state no. \$	

Form 1099-MISC (keep for your records)  
DAA

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.  S & C Productions, Inc. [REDACTED]  Melville NY 11747		1 Rents \$	OMB No. 1545-0115  <b>2017</b> Form 1099-MISC	<b>Miscellaneous Income</b>
		2 Royalties \$		
		3 Other income \$		
PAYER'S federal identification number [REDACTED]	RECIPIENTS identification number [REDACTED]	4 Federal income tax withheld \$	<b>Copy B For Recipient</b>	
5 Fishing boat proceeds \$	6 Medical and health care payments \$			
RECIPIENT'S name  Tommaso Guiseppe Street address (including apt. no.) [REDACTED] City or town, state or province, country, and ZIP or foreign postal code Staten Island NY 10312		7 Nonemployee compensation \$ [REDACTED]	8 Substitute payments in lieu of dividends or interest \$	This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds \$	
		11	12	
Account number (see instructions) [REDACTED]	FATCA filing requirement <input type="checkbox"/>	13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$	
15a Section 409A deferrals \$	15b Section 409A income \$	16 State tax withheld \$	17 State/Payer's state no. \$	

Form 1099-MISC (keep for your records)  
DAA

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

SNP-000028

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. S & C Productions, Inc. [REDACTED]  Melville, NY 11747		1 Rents \$	OMB No. 1545-0115 <b>2018</b> Form 1099-MISC		<b>Miscellaneous Income</b>
		2 Royalties \$			
		3 Other income \$	4 Federal income tax withheld \$		<b>Copy B For Recipient</b>
PAYER'S TIN [REDACTED]	RECIPIENT'S TIN [REDACTED]	5 Fishing boat proceeds \$	6 Medical and health care payments \$		
RECIPIENT'S name Spinderella Entertainment LLC  Street address (including apt. no.) [REDACTED]  City or town, state or province, country, and ZIP or foreign postal code Dallas, TX 75243		7 Nonemployee compensation \$ [REDACTED]	8 Substitute payments in lieu of dividends or interest \$		This is important tax information and is being furnished to the IRS. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale ? <input type="checkbox"/>	10 Crop insurance proceeds \$		
		11	12		
Account number (see instructions) [REDACTED]		FATCA filing requirement <input type="checkbox"/>	13 Excess golden parachute payments \$		
			14 Gross proceeds paid to an attorney \$		
15a Section 409A deferrals \$	15b Section 409A income \$		16 State tax withheld \$	17 State/Payer's state no. NY	18 State income \$

Form **1099-MISC** (keep for your records)

www.irs.gov/Form1099MISC

Department of the Treasury - Internal Revenue Service

DAA

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. S & C Productions, Inc. [REDACTED]  Melville, NY 11747		1 Rents \$	OMB No. 1545-0115 <b>2018</b> Form 1099-MISC		<b>Miscellaneous Income</b>
		2 Royalties \$			
		3 Other income \$	4 Federal income tax withheld \$		<b>Copy B For Recipient</b>
PAYER'S TIN [REDACTED]	RECIPIENT'S TIN [REDACTED]	5 Fishing boat proceeds \$	6 Medical and health care payments \$		
RECIPIENT'S name Stinson Haus LLC  Street address (including apt. no.) [REDACTED]  City or town, state or province, country, and ZIP or foreign postal code Los Angeles, CA 90015		7 Nonemployee compensation \$ [REDACTED]	8 Substitute payments in lieu of dividends or interest \$		This is important tax information and is being furnished to the IRS. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale ? <input type="checkbox"/>	10 Crop insurance proceeds \$		
		11	12		
Account number (see instructions) [REDACTED]		FATCA filing requirement <input type="checkbox"/>	13 Excess golden parachute payments \$		
			14 Gross proceeds paid to an attorney \$		
15a Section 409A deferrals \$	15b Section 409A income \$		16 State tax withheld \$	17 State/Payer's state no. NY	18 State income \$

Form **1099-MISC** (keep for your records)

www.irs.gov/Form1099MISC

Department of the Treasury - Internal Revenue Service

DAA

SNP-000029

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.  S & C Productions, Inc. [REDACTED]  Melville NY 11747		1 Rents \$ 2 Royalties \$		OMB No. 1545-0115 <b>2015</b> Form <b>1099-MISC</b>		<b>Miscellaneous Income</b>
PAYER'S federal identification number [REDACTED]		3 Other income \$		4 Federal income tax withheld \$		
RECIPIENT'S identification number [REDACTED]		5 Fishing boat proceeds \$		6 Medical and health care payments \$		<b>Copy C For Payer</b>
RECIPIENT'S name  Spinderella Entertainment LLC  Street address (including apt. no.) [REDACTED]  City or town, state or province, country, and ZIP or foreign postal code Dallas TX 75243		7 Nonemployee compensation \$		8 Substitute payments in lieu of dividends or interest \$		
Account number (see instructions) [REDACTED]		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>		10 Crop insurance proceeds \$		
FATCA filing requirement <input type="checkbox"/> 2nd TIN not <input type="checkbox"/>		11		12		
13a Section 409A deferrals \$		13b Section 409A income \$		13 Excess golden parachute payments \$		<b>For Privacy Act and Paperwork Reduction Act Notice, see the 2015 General Instructions for Certain Information Returns.</b>
14 State tax withheld \$		15 State/Payer's state no.		16 State income \$		
17 State/Payer's state no.		18 State income \$		19 State income \$		

Form **1099-MISC**

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

DAA

☒ VOID ☐ CORRECTED

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.  [REDACTED]		1 Rents \$ 2 Royalties \$		OMB No. 1545-0115 <b>2015</b> Form <b>1099-MISC</b>		<b>Miscellaneous Income</b>
PAYER'S federal identification number [REDACTED]		3 Other income \$		4 Federal income tax withheld \$		
RECIPIENT'S identification number [REDACTED]		5 Fishing boat proceeds \$		6 Medical and health care payments \$		<b>Copy C For Payer</b>
RECIPIENT'S name  [REDACTED]  Street address (including apt. no.) [REDACTED]  City or town, state or province, country, and ZIP or foreign postal code [REDACTED]		7 Nonemployee compensation \$		8 Substitute payments in lieu of dividends or interest \$		
Account number (see instructions) [REDACTED]		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>		10 Crop insurance proceeds \$		
FATCA filing requirement <input type="checkbox"/> 2nd TIN not <input type="checkbox"/>		11		12		
13a Section 409A deferrals \$		13b Section 409A income \$		13 Excess golden parachute payments \$		<b>For Privacy Act and Paperwork Reduction Act Notice, see the 2015 General Instructions for Certain Information Returns.</b>
14 State tax withheld \$		15 State/Payer's state no.		16 State income \$		
17 State/Payer's state no.		18 State income \$		19 State income \$		

Form **1099-MISC**

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

DAA

SNP-000030



☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.  S & C Productions, Inc. [REDACTED]  Melville NY 11747		1 Rents \$	OMB No. 1545-0115  <b>2014</b>  Form 1099-MISC	<b>Miscellaneous Income</b>	
		2 Royalties \$			
		3 Other income \$			
PAYER'S federal identification number [REDACTED]	RECIPIENT'S identification number [REDACTED]	4 Federal income tax withheld \$	<b>Copy 2</b>  To be filed with recipient's state income tax return, when required.		
RECIPIENT'S name  Spinderella Entertainment LLC  Street address (including apt. no.) [REDACTED]  City or town, state or province, country, and ZIP or foreign postal code Dallas TX 75243		5 Fishing boat proceeds \$			6 Medical and health care payments \$
Account number (see instructions) [REDACTED]		7 Nonemployee compensation \$ [REDACTED]			8 Substitute payments in lieu of dividends or interest \$
15a Section 409A deferrals \$		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>			10 Crop insurance proceeds \$
15b Section 409A income \$		11 [REDACTED]	12 [REDACTED]		
		13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$		
		16 State tax withheld \$	17 State/Payer's state no.	18 State income \$	
		\$		\$	

Form 1099-MISC

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

DAA

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.		1 Rents \$	OMB No. 1545-0115  <b>2014</b>  Form 1099-MISC	<b>Miscellaneous Income</b>	
		2 Royalties \$			
		3 Other income \$			
PAYER'S federal identification number	RECIPIENT'S identification number	4 Federal income tax withheld \$	<b>Copy 2</b>  To be filed with recipient's state income tax return, when required.		
RECIPIENT'S name  Street address (including apt. no.)  City or town, state or province, country, and ZIP or foreign postal code		5 Fishing boat proceeds \$			6 Medical and health care payments \$
Account number (see instructions)		7 Nonemployee compensation \$			8 Substitute payments in lieu of dividends or interest \$
15a Section 409A deferrals \$		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>			10 Crop insurance proceeds \$
15b Section 409A income \$		11 [REDACTED]	12 [REDACTED]		
		13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$		
		16 State tax withheld \$	17 State/Payer's state no.	18 State income \$	
		\$		\$	

Form 1099-MISC

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

DAA

SNP-000031

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.		1 Rents	OMB No. 1545-0115 <b>2016</b> Form 1099-MISC	<b>Miscellaneous Income</b>	
		\$			
		2 Royalties			
		\$			
		3 Other income	4 Federal income tax withheld	<b>Copy B For Recipient</b>	
		\$	\$		
PAYER'S federal identification number	RECIPIENT'S identification number	5 Fishing boat proceeds	6 Medical and health care payments		
		\$	\$		
RECIPIENT'S name		7 Nonemployee compensation	8 Substitute payments in lieu of dividends or interest		
Street address (including apt. no.)		\$	\$	This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.	
City or town, state or province, country, and ZIP or foreign postal code		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds		
		\$	\$		
		11	12		
Account number (see instructions)	FATCA filing requirement <input type="checkbox"/>	13 Excess golden parachute payments	14 Gross proceeds paid to an attorney		
		\$	\$		
15a Section 409A deferrals	15b Section 409A income	16 State tax withheld	17 State/Payer's state no.		18 State income
\$	\$	\$			\$
		\$			\$

Form 1099-MISC (keep for your records)

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

DAA

☐ CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no.  S & C Productions, Inc. [REDACTED]		1 Rents	OMB No. 1545-0115 <b>2016</b> Form 1099-MISC	<b>Miscellaneous Income</b>	
		\$			
		2 Royalties			
		\$			
		3 Other income	4 Federal income tax withheld	<b>Copy B For Recipient</b>	
		\$	\$		
PAYER'S federal identification number	RECIPIENT'S identification number	5 Fishing boat proceeds	6 Medical and health care payments		
		\$	\$		
RECIPIENT'S name		7 Nonemployee compensation	8 Substitute payments in lieu of dividends or interest		
Spinderella Entertainment LLC		\$	\$	This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.	
Street address (including apt. no.)		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds		
[REDACTED]		\$	\$		
City or town, state or province, country, and ZIP or foreign postal code		11	12		
Dallas TX 75243		13 Excess golden parachute payments	14 Gross proceeds paid to an attorney		
		\$	\$		
Account number (see instructions)	FATCA filing requirement <input type="checkbox"/>	16 State tax withheld	17 State/Payer's state no.		18 State income
\$	\$	\$			\$
		\$			\$

Form 1099-MISC (keep for your records)

www.irs.gov/form1099misc

Department of the Treasury - Internal Revenue Service

DAA

SNP-000032

# **EXHIBIT I**

SNP-000033

Pay to	Pay from	Status	Send on	Deliver by	Amount
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Pay to	Spinderella Entertainment LLC (...5822)				
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Pay from	S & C PRODUCTIONS IN (...5558)				
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Amount	\$31,500.00				
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Send on	Dec 21, 2018				
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Deliver by	Dec 24, 2018				
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Payment arrives in	1 business day				
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Addenda	Vegas residency @ \$1750 rate. 18 shows. 10 in Oct; 6 in Nov; 2 in Dec				
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Status	Paid				
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Submitted by	DENNY MENDEZ, Dec 21, 2018 12:49:02 PM				
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Last updated by	Not Available, Dec 24, 2018 8:15:03 AM				
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Chase transaction number	5208674437				
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Spinderella Entertainment LLC (...5822) VENDOR	S & C PRODUCTIONS IN (...5558)	Paid	Dec 13, 2018	Dec 14, 2018	\$3,500.00	Request info >
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Pay to	Pay from	Status	Send on	Deliver by	Amount
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Pay to	Spinderella Entertainment LLC (...5822)
--------	---

Pay from	S & C PRODUCTIONS IN (...5558)
----------	--------------------------------

Amount	\$31,500.00
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Send on	Jan 7, 2019
---------	-------------

Deliver by	Jan 8, 2019
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Payment arrives in	1 business day
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Addenda	Final payment; Vegas residency
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Status	Paid
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Submitted by	DENNY MENDEZ, Jan 7, 2019 1:43:46 PM
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Last updated by	Not Available, Jan 8, 2019 8:16:56 AM
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Chase transaction number	5209551569
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Spinderella Entertainment LLC (...5822) VENDOR	S & C PRODUCTIONS IN (...5558)	Paid	Jan 4, 2019	Jan 7, 2019	\$7,500.00	Request info >
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I, Cheryl James p/k/a Salt, do hereby state and declare as follows:

1. I am a specially-appearing defendant in the above-captioned matter, along with Sandra Denton (“Pepa”), James Maynes (“Maynes,”) and S & C Productions (“S & C”) (together, “Salt-N-Pepa” or “Defendants”). I am the performer known as “Salt” in the musical duo known as “Salt N Pepa” and we are the sole shareholders of S & C. As a result, I have personal knowledge of the facts contained in this declaration and, if called and sworn as a witness, I could and would competently testify thereto. I make this declaration in support of Defendants’ Response In Opposition to Plaintiffs’ Request For A Temporary Restraining Order.

2. Spinderella is not, and has never been, a partner of the group “Salt N Pepa.” Spinderella was always a contracted performer for the group. She was hired and fired at the discretion of myself and Pepa *via* our business entity S & C. Indeed, Spinderella’s correspondence with me from 2013 and 2014, when she was rehired to perform with the group, demonstrates: (1) the terms by which she was re-hired,<sup>1</sup> which did not include profit participation or royalties; (2) that she was grateful to me and Pepa for providing her with the opportunity to perform with them again; and (3) that Pepa and I dictated how Spinderella would perform on stage. A true and correct redacted copy (to protect privilege and privacy) of my e-mail correspondence with Spinderella from December 6 and 10, 2013, setting forth the terms of our agreement is attached hereto and incorporated herein as **Exhibit A**. A true and correct redacted copy (to protect privilege and privacy) of e-mail correspondence between me and Spinderella from September 7-8, 2014, amending the terms of our agreement is attached hereto and incorporated herein as **Exhibit B**.

---

<sup>1</sup> Spinderella had voluntarily quit performing with Salt N Pepa years earlier.

3. The group “Salt-N-Pepa” is—by definition—is comprised of me (Salt) and Pepa. The group’s name does not include Spinderella. Moreover, the group’s business is completely owned and operated by S & C, whose sole shareholders are Pepa and me. Spinderella is not—and never was—a shareholder of S & C. Spinderella never shared in the financial losses of the group “Salt N Pepa” or S & C. Nor did she have a right to control or manage the group “Salt N Pepa” or S & C.

4. Based on my communication with Jacinda Gantt at SoundExchange, Inc., in or around April 2019, I understand that Spinderella made a claim to SoundExchange, Inc. based on Salt N Pepa’s entire catalogue. To my knowledge, Spinderella failed to revise her claim to the limited number of songs to which she actually has rights (*e.g.*, she did not perform on Salt N Pepa’s entire catalogue).

I swear under penalty of perjury under the laws of the United States that the contents of this declaration are true and correct. Executed this 30th day of July, 2019 in New York City, New York.

Cheryl James  
Cheryl James



# **EXHIBIT A**

SNP-000039

-----Original Message-----

From: Deidra Roper <[REDACTED]>

To: [REDACTED] <[REDACTED]>

Sent: Tue, Dec 10, 2013 01:49 PM

Subject: Re: New Jack City remix tour

Hey Cheryl.. This is great and im excited too. Lets do a contract reflecting this and new added Boston date.. if possible can u request an additional dressing room with seating and beverages for me as well as a small advance as we get closer ?

Spin

Sent from my iPhone

On Dec 6, 2013, at 2:46 PM, [REDACTED] wrote:

Hey Spin: here are the dates as well as the deal points we discussed today. I'm excited!!

**2k per show 6 shows**  
**\$50 per day per diem**  
**\$100 per day rehearsal 3 days**  
**1 coach ticket**  
**1 regular hotel room**

**The show will run the way Salt n Pepa determine. If there is a DJ set depending on the time, Spin agrees to drop the records of Salt n Pepa choosing. No scratching during the songs.**

Feb 3rd

Feb 4th

Feb 5th

**Tour Dates**

Feb 7th Orlando Bob Carr Arena Spin

Feb 8th Charlotte Owens Auditorium Spin

Feb 14th Columbus Veteran Arena Spin

Feb 15th Newark Symphony Hall Spin

Feb 16th Buffalo Shea's Theater Spin

March 14th Cincinatti Music Hall Spin not Available Dee Wiz

March 15th Hartford Bushnell Auditorium Spin not available Dee Wiz

March 29th Richmond Landmark Theater Spin

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--

**Cheryl "Salt" James**

Salt Songs Inc.

**Email:** [REDACTED]

**Web:** SaltNPepa.net

**Twitter/Instagram:** @DaOnlySalt

*Persistence, dedication, passion, hard work, and prayer shifts the atmosphere.*

## **EXHIBIT B**

SNP-000042

-----Original Message-----

From: Cheryl James <[REDACTED]>  
To: Deidra Roper <[REDACTED]>  
Cc: Sandra Denton <[REDACTED]>  
Sent: Mon, Sep 8, 2014 2:50 pm  
Subject: Re: Ref. Spin

Great!

Sent from my iPhone

On Sep 8, 2014, at 2:39 PM, Deidra Roper <[REDACTED]> wrote:

Although we never discussed oz, in particular, due to my latest health issue, my concern for comfort when traveling for extended periods of time is all the more important .

Please know, I am extremely grateful to be back and I do appreciate and thank u for everything u have done for me and will continue to give my all at every performance .

Yes y'all, im clear that SnP would not be responsible for 1st class or upgrades. This I agree too and have no issue w travel here in states. However, Im thinking of international travel which require longer and more uncomfortable flights as well as a rigorous schedule for each of us .. Perhaps, we can let those booking agents and promoters know that Spinderella is on the show .. Spinderellas 'premium economy' ticket can be added to SnP's fee/rider to accomodate me.. This wouldn't and shouldn't come from your pockets.

I reached out for ur assistance when after speaking w Gavin and him telling me upgrades aren't available based on the flight I'm on..

I appreciate and am thankful for the raise.. this helps and I will utilize it to pay for the premium economy upgrade .

Sent from my iPhone

On Sep 7, 2014, at 9:27 PM, Sandra Denton <[REDACTED]> wrote:

Hey girl hope all is good please have a look at the email below

----- Forwarded message -----

From: **Sandra Denton** <[REDACTED]>

Date: Sunday, September 7, 2014

Subject: Ref. Spin

To: Cheryl james <[REDACTED]>

---spin we have given money to support you in the time of need not that you ask but just showing our love  
---Salt n Pepa have made a decision to give you a raise starting on the Australia tour 2014 from a fee of \$2,000 to \$2,500 which is a number that you spoke about before. So we have decided to meet that.

\_\_\_\_\_and also to be clear there was a misunderstanding, I Pepa and Gavin never had a conversation regarding your flight for Australia.

--- because what has always been on the table for all parties involved with shows regarding flights everyone is issued a coach ticket, and anyone who wants to upgrade, falls on the individual person to take care of there own upgrades.

Salt n Pepa are NOT responsible for any upgrades.

--

--

**Cheryl "Salt" James**

Salt Songs Inc.

**Email:** [REDACTED]

**Web:** SaltNPepa.net

**Twitter/Instagram:** @DaOnlySalt

*Persistence, dedication, passion, hard work, and prayer shifts the atmosphere.*